EXHIBIT A - PART 1



ADVERSE ACTION NOTICE (To comply with FCRA Section 615) Baptist Health

2105 East South Boulevard PO Box 11010 Montgomery, AL 36111-0010 Tel.: 334-286-2445

June 13, 2006

Elizabeth Horton 2600 Vaughn Lakes Blvd. Apt # 914 Montgomery, Al 36117

Dear Elizabeth:

Thank you for your recent application for employment with Baptist Medical Center Prattville. We carefully considered your application, and we regret that we are unable to offer you employment at this time. The reasons for our decision were based in part on information obtained from the consumer reporting agency identified below:

> Risk Mitigation Services, Inc. P.O. Box 294 Moulton, Alabama 35650 (866) 383-1180

In accordance with the Hair Credit Reporting Act, you have previously received a copy of this information and a copy of your rights under the Act. You have the right to obtain an additional free copy of the report within 60 days of your receipt of this letter by contacting Risk Mitigation Services, Inc. The consumer reporting agency did not make the adverse employment decision and therefore cannot explain how or why the adverse decision was made.

Sincerely,

Joann Turpen **Employment Recruiter**

> **DEFENDANT'S EXHIBIT**

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

ELIZABETH HORTON).
Plaintiff,)
v.)
DON WILLIAMS, individually and)
in his capacity as the Manager of National Seating and Mobility, Inc.,) CIVIL ACTION NUMBER:
NATIONAL SEATING AND MOBILITY, INC., GERALD) 2:06-cv-526-MHT-TFM)
SHOCKLEY, individually and in his capacity of a special agent of the)
Alabama Attorney General's Office,	
Defendants.)

NOTICE OF DEPOSITION DUCES TECUM

Please take notice that defendant National Seating and Mobility, Inc., will take the deposition on oral examination of Elizabeth Horton, before a notary public or other officer authorized to administer oaths. The deposition will continue from time to time until completed. You are invited to attend and cross examine.

Deponent:

Elizabeth Horton

Date:

November 20, 2007

Time:

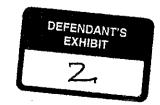
9:00 a.m.

Location:

Bradley Arant Rose & White LLP

401 Adams Avenue, Suite 780

Montgomery, AL 36104



Pursuant to Federal Rules of Civil Procedure Rule 30(b)(1), the deponent is requested to bring to the deposition the documents or things listed in Schedule A attached to this deposition notice.

Document 69-5

Charles A. Stewart III (STE067) Bradley Arant Rose & White LLP The Alabama Center for Commerce 401 Adams Avenue, Suite 780 Montgomery, AL 36104 Telephone: (334) 956-7700

Facsimile: (334) 956-7701

Elizabeth B. Mitchell (BRI050) Bradley Arant Rose & White LLP One Federal Place 1819 Fifth Avenue North Birmingham, AL 35203-2104 Telephone: (205) 521-8000

Attorneys for Defendant National Seating & Mobility, Inc.

Facsimile: (205) 521-8800

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2007, I mailed by United States Postal Service this document to the following:

Deborah M. Nickson Attorney for Plaintiff 2820 Fairlane Drive, Suite A-10 Montgomery, Alabama 36116

Dorman Walker Balch & Bingham P.O. Box 78 Montgomery, AL 36101

Jack W. Wallace, Jr.
Office of the Attorney General
11 South Union Street
Montgomery, AL 36130

Charles A. Stewart III (STE067)

Bradley Arant Rose & White LLP The Alabama Center for Commerce 401 Adams Avenue, Suite 780

Montgomery, AL 36104

Telephone: (334) 956-7700 Facsimile: (334) 956-7701

Schedule "A"

Documents To Be Produced At The Deposition Of

Elizabeth Horton

- 1. Please identify and produce any and all statements taken from any party which relate in any way to this lawsuit or the allegations in your Complaint.
- 2. Please identify and produce any and all tangible items gathered or retained as a result of the claims made the basis of your lawsuit.
- 3. Please identify and produce a listing of all damages you complain have been incurred as a result of the claims made the basis of this lawsuit.
- 4. Please identify and produce any and all reports of experts you have retained for the prosecution of this suit.
- 5. Please identify and produce any and all correspondence between you and any of the Defendants.
- 6. Please identify and produce each and every document requested by you from a third-party in the prosecution of this case.
- 7. Please identify and produce a copy of each and every document requested in the interrogatories filed by Defendant.
- 8. Please identify and produce each and every document which you allege substantiates the contentions set forth in your Complaint.
- 9. Please identify and produce any and all federal and state income tax returns filed by you for the five-year period immediately preceding the date of your termination from National Seating and Mobility up to and including the most recent return filed.

Page 7 of 50

- 10. Please identify and produce any and all investigative reports and written or recorded statements, to the extent not done so above, compiled in your prosecution of this lawsuit.
- 11. Please identify and produce a copy of any and all documents consulted, referred to, or otherwise utilized in any way in connection with the preparation of your responses to Defendant's interrogatories and/or requests for production.
- 12. Please identify and produce any and all documents that reflect, relate to, or arise out of any of the facts that form the subject matter of this litigation.
- 13. Please produce any and all documents or materials that you have collected for this case from an individual or entity other than Defendant, including, but not limited to, depositions, trial transcripts, and documents relative to all defendants and/or their expert witnesses in this case.
- 14. Please produce any tape recordings or statements you have taken of any party or witness relating to this case.
- 15. Please produce any photos, videotapes, or recordings of any person, place, or thing which has been created for this lawsuit or which relates to the issues in this case.
 - 16. Please produce the most recent photograph of Plaintiff in your possession.
- 17. Please identify and produce a list of the medical care providers you have seen in the past ten years relating to the damages you claim in your complaint.
- 18. Please produce all documents relating to the medical care you received from those individuals identified in response to preceding request.
- 19. Please identify and produce as list of all medical care providers you have seen in the past ten years.

- 20. Please produce all documents relating to the medical care you received from those individuals identified in response to preceding request in your possession or control.
- 21. Please identify and produce a list of all counselors, lay counselors, psychologists, psychiatrists you have seen in the past ten years.
- 22. Please produce all documents relating to the care you received from those individuals identified in response to preceding request in your possession or control.
- 23. Please identify and produce all records relating to your arrest and prosecution including all exhibits used at your trial.
- 24. Please identify and produce a list of the names and addresses of all employers past and present including the name of your immediate supervisor and the dates you were employed at each and the reason for your leaving said employment.
- 25. Please produce a copy of all prescriptions or the front label off of prescription containers of any medicine or drug that you are currently taking or have taken within the last two years.

March 22, 2006

Elizabeth Horton 2600 Vaughn Lakes Blvd. Apt. 914 Montgomery, AL 36117

Dear Elizabeth:

It has been brought to my attention in more than one instance you behaved in a manner that created a hostile work environment of a sexual nature. An investigation confirmed you did indeed create such a hostile work environment.

HMMA considers your actions to be a serious misconduct violation. When a person commits an action such as this against HMMA and/or his/her fellow Team Members, he/she may be terminated from employment.

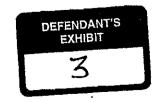
Based on the aforementioned, I regret that I have no alternative but to terminate your employment, effective immediately.

Your benefits will cease as of 11:59pm March 31, 2006. The HMMA benefits department will forward COBRA information to you.

Sincerely,



Harry Chase Manager, Production Control Hyundai Motor Manufacturing Alabama, LLC



HMMA 0027

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\$253.87	\$2,232.00	\$4,006.40	\$531.32	\$4,936.00	\$9,811.75	\$228.90	\$1,422.40	\$3,285.36	\$26.50	\$5,183.20	\$3,327.40	\$4,424.00	\$1,231.20	\$2,358.40	\$235.78	\$1,231.20	\$2,174.40	\$408.92	\$476.18	\$4,760.20	\$451,38	\$7,289,58	\$751.00	\$3,279.40	\$682.60	\$1,185.60	\$3,175.20	\$1,374.84	\$2,180.00	\$3,791.20	\$1,252.00

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Employment Application:

Name: Elizabeth WAHAN-HOVTON

Position Desired: Technical Support

Application Date: $\sqrt{2405}$

Appointment Notice

HMMA fully compiles with the southand intervol lave regarding intends of the engine repair of the engine of the en



DEFENDANT'S EXHIBIT

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Horton v. NSM Hyundai 040

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			-,		
I hereby certify that the en Any material omissions or	tries on this form and any other statem misstatements are grounds for termina	CERTIFICA ents made by me to Hyundai Motor Manuf ation.	III. ON acturing Alabama, LLC ar	e, in connection with my applica	tion for employment, true and correct.
	• •	nt upon my submitting documentation of m	y legal right to work in the	United States,	·
I agree to submit to a phy- considering my application	rsical examination and drug screen. I	also authorize HMMA to request from my use HMMA, and such other employers o NYTHING IN THIS APPLICATION IS FOU	former employers, and	and other nature, and information	on which HMMA may lawfully seek in and/or providing such information.
In consideration of my em TERMINATED WITHOUT	oployment, I agree to conform to the	THE OPTION OF NIVER FOR UNION	DERSTAND THAT MY E		SATION IS AT WILL AND CAN BE AA, other than the President, has any
Signature of Applicant	Secure in the employment for any speci	fied period of time, or to make any agreem	ent contrary to the foregod	24) UT	

Hyundai Motor Manufacturing Alabama, LLC, 7515 Halcyon Summit Drive, Montgomery, AL 36117

Elizabeth Walton Horton

2600 Vaughn Lakes Blvd. # 914 Montgomery, Al 36117 Home Phone 334.279.7960

<u>OBJECT</u>IVE

To obtain a rewarding career with a strong company that has an opportunity for growth and advancement that will fully utilize my talents and abilities.

QUALIFICATIONS

I have five years experience in customer service that allowed me to develop a good understanding of what it takes to meet a customers needs.

I have experience in a manufacturing environment involving locating parts according to bills of material, and supplying the assembly area with the proper materials. I interacted with several different departments to help control the flow of production materials, and interacted with suppliers. Two years experience working at Job Fairs and as a HR Recuiter.

WORK HISTORY

Customer Service Representative, EDS July 2004 - Present

- Assisted customers with inquiries concerning claims, eligibility, and ALXIX medical guidelines via customer service phone line.
- Educated customers on resources available on the corporate customer service website.
- Processed medical claims, confirmed filing timing, verified electronic filing information, and completed new enrollment requests.
- Answered customer's questions according to medical guidelines.
- · Assigned group pins, and individual pins to customers.

Investment Account Representative, CIGNA March 2000-March 2004

- Assisted clients on management of their accounts including balance inquiries, funds transfer, and loan disbursements.
- Ensured clients satisfaction with all services provided education of all funds, money
 market funds, within their 401K accounts facilitate on and off site meeting, training classes
 for Administrations of the accounts and their employees.

Material Handler, Yale Hoists, November 1995- February 2000

- Delivered the appropriate production materials to assembly process locations using FIFO principles.
- Verified proper parts for build before removing from inventory using blueprints and bill of materials.
- Received training and certification to operate stand-up and sit-down electric fork trucks.
- Transferred production parts and finished goods between departments.
- Isolated rejected materials and prepared the parts for return shipment to the supplier.
- Organized production materials for delivery to production according to daily build schedules.
- Maintained parts storage areas to make parts retrieval and inventory counts more
 efficient
- · Updated inventory records electronically to coincide with materials removal.

DEFENDANT'S EXHIBIT

Horton v. NSM Hyundai 035

- Delivered the appropriate production materials to assemble seats for automotive customers. (Chrysler, GM)
- Verified removing the correct materials from inventory using blueprints and bill of materials and following FIFO practices.
- Received training and maintained certification to operate stand-up and sit-down electric fork trucks.
- Isolated rejected materials and prepared the parts for return shipment to the supplier.
- Organized production materials for delivery to production according to daily build schedules.

EDUCATION

A.S. Computer Programming, University of Arkansas Little Rock, 1985 Certification: Medical Assistant, Health Information Specialist, Capitol City Junior College, 1984

COMPUTER SKILLS

WordPerfect, Microsoft Word, Microsoft Outlook, Microsoft Excel, data entry

LICENCES

Broker Series 6, Series 63

OT-OK rotating 8 nifts - OK *mail-ehorton@charter.net HYUNDAI
914 Phone Screen for Salaried Recruitment



Candida	te Elizabeth Watto	on Horton	Base Pay:		27	K				
Job Title	Customer Service	Rep.	College/U	nive	ersi	ty_ <i>f</i>	lniv trka	of ansas	-Little	Rock
Dates of	f Employment:	Degree AS	Major_	omp Pro	ute. }·-	GP.	A			
From 7/20	004 To present	Recommend	ed for Inte	rvie	w:	Ye	S	No		
	have unlimited authorization to is your status? Yes	work in the United	1 States? If	1	2	3	4	5		
	avel may be required for this po Torea or within the US to Detroi		willing to	1	2	3	4	5		
	e the highlights of your current es related to employment at HM		he r	1	2	3	4	5		
you about.	s you considering a job change a working at HMMA? Are you w ed in pred.enviro. good,	rilling to relocate to	Alabama?	1	2	3	4	5		
contributor	prefer working in a managerial ?? Why? Ure parts of the teau			1	2	3	4	5		
environmen		•		1	2	3	4	5		
7. Do you c	Oblem—The usual consider yourself to be a multi-t	asker? Give me an		1	2	3	4	5	-	
8. What are	viring + Clip (testing your long term career objective who for Company Li	es?		1	り2	3	4	5		
further deve Strery	you consider your strengths? W elopment? OHNS— GLÜCK learner,	productive	people on	1 ien	2 ted	³	4 ⁻	5	·	
- Unacceptable 2 - Les	- A SPECTS Of NEW Jok ss Than Acceptable 3-Acceptable 4) - More Than Acceptab	le 5-Much Mo	re Tha	ıı Ac	ceptal	ble	Horton	v. NSM	

037



Candidate Evaluation Form

Candidate: Elizabeth Horton Date: F27-05 Department: Production Control		-	: <u>157</u> : Tech		Support	
	Low			_	High	
Education adequate for position	1	2	3	(4)	5	
Understands department relevant concepts	1	2	(3)	٠ 4	5	
Adequate on-the-job experience	1	2	(3)	4	5 、	
Planning ability with examples	. 1	2	(3)	4	5	
Execution ability with examples	1	2	(3)	4	5	
Cost saving philosophy NA	1	2	3	4	5	
Supervised hourly workforce (supervisor only) NA	1	2	3	4	5	
Supervised salary workforce (supervisor only) NA	1	2	3	4	5	
Conflict resolution philosophy (production)	1	2	3	4	5	
Technical knowledge	1	2	(3)	4	5	
Responds well to questions	1	2	3	4	5	
Looks at people when talking	1	2	3	4	5	
Enthusiastic about company/position	1	2	3	4	5	
Asks appropriate questions	1	2	$\binom{3}{2}$	4	5	
Computer Expertise	1	2	(3)	4	5	
Other Notes on Candidates:	•				·····	
•		· .	··		-	
	-	-,			-	_
	<u> </u>					_
Vuluma. Gran Strand		•				
Ky Jung, Greg Stroud Stacy M. Jones Dimension Two:	1	(2)	3	4		
Recommended Candidate: Yes		No ,			leeds 2nd Interview	

<u> </u>	rov. Docu. Check-List	•	Date:
		, and the second second	
• .		.	02/01/05
	Gurrent	Proposed	
Name	· · · · · · · · · · · · · · · · · · ·	Referral/Recruiter:	
Department	8	Production Control	
Job Titles		Tech Support - Engine	
Employment History	2	7/04 to Present	
	CIGNA	3/00 to 3/04	
	Presently employed.		
Educations		<u> </u>); X
Area of Degree;	3	er Programming	
Salary Current:	\$28,808	Offered:	
Attitude		Fair: Good: X Excellent:	
Additional Remarks:		·	
tems	CHK-Point	Failure/Error Cases	
Cover Sheet	- Reporting Sys.		-
	; cf) RFEmp & Offer-Letter	1	İ
1.	2-a) Salary Info.		
	; cf) RFEmp & Offer-Letter		
	; Sign-on Bonus info.		
	2-c) Job Title		
	; cf) RFEmp & Offer-Letter	,	
	4. Start Date		
Pre-Offer Letter	- Reporting Sys.		
	; cf) RFEmp		İ
	- Proper Title		. [
	; Accurate, RFEmp		}
	- Salary/bonus Info.		1
	; Accurate, RFEmp		1
	-Vacation Info.		ļ
	; Accurate, policy		
	- Car lease Clauses		
Div. Salary Status	- Approv. Signatures/Co-signed		
Request for Emp.	-Approv. Signatures/Co-signed	SAK	
(RFEmp)	- Salary/bonus Info.		
Salary Comparison	- Department Comparisons	SAS	
Organizational Chart	- Designating Position	SAS	
Job Requisition	- Approv. Signatures/Co-signed		
	; upto Directors		
	- Co-signed by S. Gordy	SAS	ŀ
	; based on Hires plan		
Resume	- cleaned Resume	SAS .	
Phone Screen	- objectvely evaluated by HR	SAS	
	- objectvely evaluated by HR	ŞAS	
Employment Appl.	- veryfy info.	SAS	·
	; Degree, Address, Salary etc		

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

ELIZABETH HORTON,)
PLAINTIFF,)
vs.) CV 2:06-CV526-MHT
DON WILLIAMS individually and in his capacity of the Manager of National)
Seating and Mobility, Inc., NATIONAL SEATING AND MOBILITY, INC., and) DEMAND FOR JURY TRIAL
GERALD SHOCKLEY, individually and in his capacity of a special agent of the))
Alabama Attorney General's Office,)
DEFENDANTS.)

PLAINTIFF'S RESPONSE TO DEFENDANT DON WILLIAMS' INTERROGATORIES AND REQUEST FOR PRODUCTION

COMES NOW, Plaintiff Horton, by and through her undersigned Attorney and respectfully submit the following response:

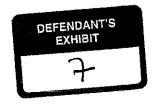
1. Please identify by name and address each medical doctor or doctor of osteopathy who provided a medical service to you since January 1, 2003.

ANSWER: Dr. Vernal Wool, PH.D., P.A. 1620 Carter Hill Road Montgomery, AL 36106 334-265-4828

> Dr. Kynard Adams 1323 Mulberry Street Montgomery, AL 36106 334-264-3434

Dr. Ken Looney 1701 Forest Ridge Beford, Texas 76022 817-545-7700

Dr. Hadi R. Tajani 1604 Hospital Pkwy Ste 507 Bedford, Texas 76022



2. For each person identified in response to interrogatory no. 1, please state the diagnosis made by that person, the medical service provided by that person, and the date of such diagnosis or service.

ANSWER: Each person diagnosed me as depressed. My depression started mild to manic with suicidal thoughts. Dr. Tajani said that I am now bipolar as a result of the occurrence of the arrest. I lost my job and my marriage.

3. Please provide each document in your possession or control that relates to or arises from each diagnosis or medical service provided to you by each of the persons identified in your response to interrogatory no. 1.

ANSWER: See attached.

4. Please identify by name and address each therapist, counselor, pharmacist, or other provider of medical services (not including medical doctors or doctors of osteopathy identified in response to interrogatory no. 1) who provided a diagnosis or medical service to you since January 1, 2003.

ANSWER: Cheryl L. Bowie, Therapist
Northeast Psychiatric & Couselling Offices
Bedford, Texas

Walgreens Pharmacy Atlanta Hwy Montgomery, AL

Walgreens Pharmacy Forest Ridge Location Bedford, Texas

Winn Dixie Pharmacy 2730 Eastern Blvd Montgomery, AL 36116 334-272-2343

5. For each person or entity identified in response to interrogatory no. 4, please state the diagnosis made by that person, the nature of the medical service provided by that person or entity, and the date of each such service.

ANSWER: Cheryl L. Bowie-Depression. Therapy
I went to the pharmacy to have prescriptions filled.
See attached for prescriptions.

6. Please provide each document in your possession or control that relates to or arises from each diagnosis or medical service provided to you by each of the persons identified in your response to interrogatory no. 4.

ANSWER: See attached.

7. Please identify each drug, or item of durable medical equipment, prescribed for you by any person identified in your response to interrogatories 1 and 4, since January 1, 2003. In your response, please state who prescribed the drug or item, when it was prescribed, the prescribed dosage or usage, and whether you currently use the drug or item.

ANSWER: See attached Hospital records which include prescribed medicines. And pharmacy records.

8. Please identify each medical complaint or condition, illness, disease, ailment, or malady that you believe you have had, or which you have been diagnosed as having, since January 1, 2003.

ANSWER: Since my arrest, I have experienced a deeper depression which has led to suicidal thoughts. I have suicides thoughts every day, feeling of worthlessness, unable to sleep for weeks, a failure in life, thoughts of running in front of a car or truck that would kill me instantly. I experience anger when I think about what happened to me in Montgomery. My mind races all the time with thoughts of taking sleeping pills that was prescribed to me in hopes of never waking up again. Many times I am afraid to go outside my apartment. I have headaches all the time. My appetite is still not good.

10/5/07

Elizabeth Horton

State of Alabama Texas
Montgomery County Tarract

Sworn to and subscribed before me this the 5th day of October, 2007.

CINDY L. REHOR
NOTARY PUBLIC
STATE OF TEXAS
is a largem, (Sa), 05-17-2009

Notary Public

My Commission Exp: 5-17-09

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Response on all counsel of record by mailing a copy of the same in the U.S. Mail, postage prepaid, and envelope properly addressed on this the 5th day of October, 2007.

Deborah M. Nickson
Attorney for Plaintiff Horton

Hon. Charles A. Stewart, III Hon. Elizabeth Mitchell Bradley, Arant, Rose & White LLP The Alabama Center for Commerce 401 Adams Avenue Montgomery, AL. 36104

Hon. Dorman Walker (Hand delivery) Balch & Bingham LLP P.O. Box 78 Montgomery, AL. 36101

Hon. Jack W. Wallace, Jr. Office of the Attorney General 11 South Union Street Montgomery, AL. 36130 Cheryl L. Bowle LCSW; LMFT 2700 Tibbets Drive Suite 408 Bedford, Texas 76022

RE: Horton, Elizabeth September 25, 2007

To Whom It May Concern:

I have been requested by Ms. Elizabeth Horton to provide a statement concerning the difficulties she experienced after reporting irregularities in her workplace. Ms. Horton was initially seen in my office on February 7, 2007 for major depression with symptoms including:

- feelings of depression
- anxiety and panic attacks
- fatigue
- decrease in energy
- loss of interest in pleasureable activities
- difficulty concentrating
- increased tearfulness
- suicidal thoughts and actions
- appetite change
- difficulty sleeping

Ms. Horton described increasing stress and depressive symptoms after she reported irregularities in medicaid billing. She stated that she believes she lost her job at Hyundai due to these stressors which resulted in tremendous financial stess. This financial stress created marital problems and contributed to divorce. She also was subsequently unable to pay college tuition and her child had to withdraw from college. This created a very difficult emotional environment for Ms. Horton. When Ms. Horton was initially seen, she was unable to function on a daily basis and had been hospitalized for depression and a suicidal act. Frecommend that she continue counseling on an ongoing basis and cannot predict an end for therapy as it appears that this has impacted her negatively.

Sincerely.

Cheryl L. Bowle LCSW: LMFT

Cheryl L. Bowle LCSW; LMFT 2700 Tibbets Drive Suite 408 Bedford, Texas 76022

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Cheryl L. Bowle LCSW; LMFT

Cheryi L. Bowle LCSW; LMFT 2700 Tibbets Drive Suite 408 Bedford, Texas 76022

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Sincerely.

Chervi L. Bowle LCSW: 1 MFT





Español

Rx Claim History For ELIZASET HORTON

Us	e the Rx Tools next to each claim : the drug claims, alt	ecord listed below to learn more about ernatives and prices.
To the time of the second seco	Verify Verified Maccurate	These tools allow you to verify the accuracy of your drug claim. To personalize the information presented to you, it is important that you verify the accuracy of each prescription in your Rx Claim History.
The same same same same same same same sam	Compare Drug Prices Potential Drug Savings	These tools allow you to compare the prices of similar drugs. If you see the "!" icon, a generic is available for the brand name drug you are taking.
Rx		Select this tool to get detailed information about the drug including uses, side effects and drug interactions.

View Normal

Filter By Date Filled - Jan

Claims paid 10	0-1-2004 thru 10-2-2007				
Rx Tools	<u>Drug Claim Detail</u>	<u>Date Filled</u>	Quantity	Your Cost	What Your Plan Paid
85 Q Q	ALPRAZOLAM 0.5 MG TABLET	12/2/2006	60	\$5.00	\$0.09
© 0	AVALIDE 150-12.5 MG TABLET	12/2/2006	30	\$20.00	\$39.63
RX 0 0	EFFEXOR XR 75 MG CAPSULE SA	12/2/2006	30	\$10.00	\$89.71
800	EFFEXOR XR 75 MG CAPSULE SA	11/15/2006	30	\$10.00	\$89.71

5 O O	AVALIDE 150-12.5 MG TABLET	11/15/2006	30	\$20.00	\$39.63
& 0 0	ALPRAZOLAM 0.5 MG TABLET	11/15/2006	60	\$5,00	\$0.09
B 0 0	LEXAPRO 10 MG TABLET	10/29/2006	30	\$10.00	\$63.55
*0 0	ZYRTEC-D TABLET	10/19/2006	60	\$20.00	\$43.83
* 0 0	LEXAPRO 10 MG TABLET	10/3/2006	30	\$10.00	\$63.55
8x 0 0	AVALIDE 150-12.5 MG TABLET	10/3/2006	30	\$20.00	\$39.63
* 0 S	AVALIDE 150-12.5 MG TABLET	9/9/2006	30	\$20.00	\$39.63
500	AZITHROMYCIN 250 MG TABLET	9/2/2006	6	\$5.00	\$27.34
500	ZYRTEC-D TABLET	9/2/2006	60	\$20.00	\$43.83
800	AVALIDE 150-12.5 MG TABLET	8/6/2006	30	\$20.00	\$39.63
800	LEXAPRO 10 MG TABLET	8/6/2006	30	\$10.00	\$63.55
∞ 0 0	VIGAMOX 0.5% EYE DROPS	6/25/2006	3	\$10.00	\$43.32
8 0 O	AVALIDE 150-12.5 MG TABLET	6/23/2006	30	\$20.00	\$39.63
500	LEXAPRO 10 MG TABLET	6/23/2006	30	\$10.00	\$63.55
80 €	ALPRAZOLAM 0.5 MG TABLET	6/13/2006	60	\$5.00	\$0.09
800	GLUTOFAC-MX CAPLET	6/13/2006	60	00.0₁□	\$16.09
00	LEXAPRO 10 MG TABLET	5/15/2006	30	\$10.00	\$63.55
⊗ 0 0	AVALIDE 150-12.5 MG TABLET	5/15/2006	30	\$20.00	\$39.63

00 0	LEXAPRO 10 MG TABLET	4/11/2006	30	\$10.00	\$63.55
800	AVALIDE 300-12.5 MG TABLET	4/11/2006	30	\$20.00	\$43 . 59
800	TRAZODONE 50 MG TABLET	4/11/2006	15	\$2.7 5	\$0.00
∞0 0	EFFEXOR XR 75 MG CAPSULE SA	3/27/2006	30	\$0.00	\$10.00
90 0	AVALIDE 300-12.5 MG TABLET	3/27/2006	30	\$0.00	\$20.00
R× 0 0	GLUTOFAC-MX CAPLET	3/13/2006	60	\$20.00	\$16.09
® 0 0	CYPROHEPTADINE 4 MG TABLET	3/11/2006	90	\$0.00	\$5.00
8×3 (2) (3)	ALPRAZOLAM 0.5 MG TABLET	3/11/2006	60	\$5.00	\$1.04
® 0 0	LOTREL 10/20 MG CAPSULE	2/19/2006	30	\$0.00	\$10.00
© 0 0	EFFEXOR XR 75 MG CAPSULE SA	2/19/2006	30	\$0.00	\$10.00
RX 00 0	AVALIDE 300-12.5 MG TABLET	2/19/2006	30	\$0.00	\$20.00
RX) 🚱 😜	BIAXIN XL 500 MG TABLET SA	2/19/2006	20	\$0.00	\$10.00
ry Q 😌	PSEUDO- CHLORPHENIRAMINE CAP	.2/19/2006	10	\$5.00	\$3.48
90 0	ALPRAZOLAM 0.5 MG TABLET	1/17/2006	60	\$5.00	\$1.04
≥00	ZYRTEC-D TABLET	1/9/2006	60	\$0.00	\$20.00
8 0 0	LOTREL 10/20 MG CAPSULE	1/9/2006	30	\$0.00	\$10.00
rs 0 0	EFFEXOR XR 75 MG CAPSULE SA	1/9/2006	30	\$0.00	\$10.00
* 0 0	AVALIDE 300-12.5 MG TABLET	1/9/2006	30	\$0.00	\$20.00

8× @	METRONIDAZOLE 500 MG TABLET	12/29/2005	14	\$4.70	\$0.00
© 0	TERCONAZOLE 0.4% CREAM	12/29/2005	45	\$0.00	\$5.95
Res 🕡	PROPOXY-N/APAP 100- 650 TAB	12/28/2005	15	\$4.83	\$0.00
Rx 🕖	PENICILLIN VK 250 MG TABLET	12/28/2005	40	\$5.00	\$3.88
Rx 🕡	SYMBYAX 6-25 MG CAPSULE	12/27/2005	30	\$0.00	\$10.00
RX Ø	AMBIEN 10 MG TABLET	12/19/2005	30	\$0.00	\$10.00
_	LOTREL 10/20 MG CAPSULE	12/10/2005	30	\$0.00	\$10.00
RX. O	AVALIDE 300-12.5 MG TABLET	12/10/2005	30 .	\$0.00	\$20.00
R× Ø:	LOTREL 10/20 MG CAPSULE	11/6/2005	30	\$0.00	\$10.00
8× @ ∶	AVALIDE 300-12.5 MG TABLET	11/6/2005	30	\$0.00	\$20.00
® Ø	EFFEXOR XR 75 MG CAPSULE SA	11/6/2005	30	\$0.00	\$10.00
Rx, 🔞	ZYRTEC-D TABLET	11/6/2005	60	\$0.00	\$20.00
8× @	METRONIDAZOLE 500 MG TABLET	9/20/2005	14	\$4.34	\$0.19
8 0	ZYRTEC 10 MG TABLET	9/18/2005	30	\$0.00	\$20.00
RX 👰	ALPRAZOLAM 0.5 MG TABLET	9/18/2005	60	\$5.00	\$0.94
Rx. 🕝	AVALIDE 300-12.5 MG TABLET	9/7/2005	30	\$0.00	\$20.00
rs Q	EFFEXOR XR 75 MG CAPSULE SA	9/7/2005	30	\$0.00	\$10.00
RX O	LOTREL 10/20 MG CAPSULE	9/7/2005	30	\$0.00	\$10.00

® 0 0	EFFEXOR XR 75 MG CAPSULE SA	8/8/2005	30	\$0.00	\$10.00
800	ZYRTEC 10 MG TABLET	8/8/2005	30	\$0.00	\$20.00
∞00	LOTREL 10/20 MG CAPSULE	8/8/2005	30	\$0.00	\$10.00
*> Q Q	AVALIDE 300-12.5 MG TABLET	8/8/2005	30	\$0.00	\$20.00
RX O	SYMBYAX 6-25 MG CAPSULE	8/2/2005	30	\$0.00	\$20.00
RX 0 0	ALPRAZOLAM 0.5 MG TABLET	7/20/2005	60	\$5.00	\$0.94
Rx 🚱 🐧	ZYRTEC 10 MG TABLET	6/29/2005	30	\$0.00	\$20.00
B 0 0	AVALIDE 300-12.5 MG TABLET	6/29/2005	30	\$0.00	\$20.00
8 0 0	EFFEXOR XR 75 MG CAPSULE SA	6/29/2005	30	\$0.00	\$10.00
* 0 0	AMBIEN 10 MG TABLET	6/29/2005	30	\$0.00	\$10.00
** 0 0	LOTREL 10/20 MG CAPSULE	6/29/2005	30	\$0.00	\$10.00
RX 0 0	EFFEXOR XR 75 MG CAPSULE SA	5/26/2005	30	\$0.00	\$10.00
ex, g G	LOTREL 10/20 MG CAPSULE	5/26/2005	30	\$0.0 0	\$10.00
× 00	AVALIDE 300-12.5 MG TABLET	5/26/2005	30	\$0.00	\$20.00
rs 0 0	AMBIEN 10 MG TABLET	5/21/2005	30	\$0.00	\$10.00
Rxy Q Q	ZYRTEC 10 MG TABLET	5/21/2005	30	\$0.00	\$20.00
5 6	EFFEXOR XR 75 MG CAPSULE SA	4/24/2005	30	\$0.00	\$10.00
Rx, 🕢 🔮	AMBIEN 10 MG TABLET	4/24/2005	30	\$0.00	\$10.00

	()						
	RX Q	0	AVALIDE 300-12.5 MG TABLET	4/24/2005	30	\$0.00	\$20.00
	® 0	0	ZYRTEC-D TABLET	4/13/2005	60	\$20.00	\$40.89
	₩ Q	0	EFFEXOR XR 75 MG CAPSULE SA	3/25/2005	30	\$10.00	\$78.88
	8 ≥ ②	0	AVALIDE 300-12,5 MG TABLET	3/25/2005	30	\$20.00	\$41.23
	R× Ø		AMBIEN 10 MG TABLET	3/25/2005	30	\$10.00	\$82.18
	№ 0	0	LOTREL 10/20 MG CAPSULE	3/25/2005	30	\$10.00	\$69.00
	* 0		LOTREL 10/20 MG CAPSULE	2/22/2005	30	\$10.00	\$69.00
	85 6	G	AVALIDE 300-12.5 MG TABLET	2/22/2005	30	\$20.00	\$41,23
•	⊗ ©	0	AMBIEN 10 MG TABLET	2/22, 2005	30	\$10.00	\$77.88
	* 0	0	EFFEXOR XR 75 MG CAPSULE SA	2/22/2005	30	\$10.00	\$78.88
	5 Q	0	AVALIDE 150-12.5 MG TABLET	1/31/2005	60	\$20.00	\$92.82
	** 0	Ø	SYMBYAX 6-25 MG CAPSULE	1/31/2005	30	\$20.00	\$201.51
	∞ 0	0	PROPRANOLOL 20 MG TABLET	1/13/2005	60	\$5.00	\$0.30
	RX Q		ALPRAZOLAM 0.5 MG TABLET	1/13/2005	30	\$3. 55	\$0.00
	₽X 🚱	Q	ZYRTEC 10 MG TABLET	12/21/2004	30	\$20.00	\$38.08
	es 🚱	0	SYMBYAX 6-25 MG CAPSULE	12/21/2004	30	\$20.00	\$201.51
	es 🙆	0	AVALIDE 150-12.5 MG TABLET	11/27/2004	60	\$20.00	\$89.70

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* 0 0	ZYRTEC 10 MG TABLET	11/26/2004	30	\$20.00	\$38.08
8 0 0	EFFEXOR XR 75 MG CAPSULE SA	10/23/2004	30	\$10.00	\$7 8. 88
890 0	AVALIDE 150-12.5 MG TABLET	10/23/2004	30	\$20.00	\$35.85
® 0 0	PROPOXY-N/APAP 100- 650 TAB	10/19/2004	15	\$4.25	\$0.00
B 0 0	PENICILLIN VK 500 MG TABLET	10/19/2004	40	\$5.00	\$7.00

Totals

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\$684.42 \$3,027.85

Horton, Elizabeth

3-3-06

Elizabeth was somewhat tearful. Aggitated. "I'm not ready for court on April eleventh. I'm nor physically or emotionally ready. Tired. Just not with it." Said repeatedly she transferred from Nashville to Montgomery and embarrassed in front of two-thousand people. Would like to be in Nashville. Said she needed a break from him and he begged her to come here. He let me sit in jail for a hundred and twenty-five dollars. Upset because they want to get information about this company. He refused to get me out for a hundred and twenty-five dollars. I got him out of jail in Iowa for five-thousand dollars for drunken driving."

Gave me the telephone number of her Lawyer Kelli McDaniels 269-5585 and she will sign a release.

Complains that Chris came for therapy only three times and said he would not be willing to let this other woman alone and took her to the movies. How did that make the marraige work. Refused to change his behavior. Still with her.

We asked Elizabeth what she is asking for from court. She said she is asking for "time to work with me so she can get back to the state where she can focus mentally. I'm screwing up at work. I can't remember things at work. (Said job was in jeopardy)."

Repeated, "I could have been in Nashville." We tried to point out how she was allowing Chris to defeat her. She "want to get back to the way I was. Strong. Physically and mentally. I'm de-(Assures me that she is not suicidal.) I make a lot of mistakes at work. Can't remember...He shows more respect to her than to me and I was his wife. All he had to do was tell me he wanted to be with her. Instead he let me find out and twothousand other people. Worked one year at Hyundai: It's been going on since May two-thousand and four with him.

Verna L. Wool, Ph.D., FAClinP, ABPP

VLW/ded

Horton, Elizabeth

3-27-06

These are some highlights from what Elizabeth told me today. "I got papers and filed for my unemployment." Asked if she was fired she said "exactly... They fired me for several incidents that I created a hostile environment of a sexual nature." She said"I asked him if I was beautiful. Showed cleavage. I've never been talked to. Never been written up. Employment Office will do its own investigation. Let me draw unemployment." She read me part of the letter which stated created a hostile environment of a sexual nature. Investigation was done and you did indeed act in this manner. We had no choice but to discontinue your employment at Hyundai immediately." She said she was handed the letter at the gate Wednesday, 3-22-06 and she was not allowed to go into the gate.

Her lawyer, Lynn Nixon has sent this to the Vice-President and the CEO of Hyundai. The paper was signed by someone who is not Elizabeth's boss. Lynn Nixon was the lawyer"who handled my case when the police department tried to arrest me for nothing." She said she will get on the computer today and update her resume and send it out. She will walk to the drugstore and get her medicine. "I'll be okay. One of these days I hope I can see you again this week. My insurance with Hyundai runs out this week on 3-31-06. Insurance with Chris is until the court date. I am going to ask the court to keep me on his insurance for a year."

She explained that she lent this man three-hundred dollars and his check bounced. "He's white and I'm black." I've been complaining about this guy a long time... I said if you don't pay me I'm going to take this check to court and get my money. He did not expect to pay me at all...I've never been talked to. Never been written up. Employment office will do its own investigation... I asked him for my money and this is what happens. I lent him the money and he wrote me a bounced check."

Verna L. Wool, Ph.D., FAClinP, ABPP

VLW/ded

Horton, Elizabeth

4 - 7 - 06

Elizabeth was very tearful today. She said the court date is the eleventh of this month and she is not ready. We talked about outpatient and inpatient treatment. She had in her mind that she would go to the Montgomery Area Authority. We tried about four times to reach someone there and left a message for the counsellor there to call us. Elizabeth said, "I need some help. I need help. Been scratching my back. She pulled up her shirt and there were some marks on her back. She said that she has been making these marks with a knife, not breaking the skin. "I get a steak knife and scratch my back."

I told her about the appointment she had not kept when she was "having suicidal thoughts." She said that she called her brother and "they came down... I need someone who can keep an eye on me at night. Go to Mental Health and find out why I'm having these thoughts again. Am on Chris' insurance... Even after losing my job Chris has not come by to say how are you doing." She wept and I said that it was important for her to stop carrying the torch for Chris. She asked "why do bad things happen to me. If only I can keep the faith." Said her family lives in Little Rock. "I'm not ready for court. I need to see you five days a week. I'll see you--I love being here anyway--I need time to spend with you. I'm not ready for court. till I can get some help from you. (What will it take to be ready) I have to stop feeling that it is my fault. My life is not worth anything. That I'm not a loser. I just don't understand why people do these things to people. I wanted to stay in Nashville and months later he did what he did. He deceived me. When I wanted to stay in Nashville. He said he has been feeling this way for three years. I'd never have moved here. I feel I'll just tear his head off. I just want to do something to him. He did me wrong. I hate him." (I explained that she could hate him but not act out that hatred.

We talked about her lawyer Kelli McDaniel 269-5585 and then we asked does Elizabeth feel suicidal and her response was "I always feel that way."

The upshot was that I called Dr. Pointer at Griel 262-0363 and he said that Probate Court would be the way to go. More immediately Elizabeth can go to the ER at Baptist South and be admitted to. Meadhaven if they have room. He said that Jackson Hospital keeps a patient in the ER until they can be admitted to Griel. Elizabeth asked did she have to bring clothes and then said that her family was here, her daughter was here and her daughter could bring her

She agreed to go immediately to Baptist South ER. I will call Kelli McDaniel and inform her of this plan.

Verna L. Wool, Ph.D., FACLinP, ABPP

VLW/ded

Cheryl L. Bowle LCSW; LMFT 2700 Tibbets Drive Suite 408 Bedford, Texas 76022

RE: Horton, Elizabeth September 25, 2007

To Whom It May Concern:

I have been requested by Ms. Elizabeth Horton to provide a statement concerning the difficulties she experienced after reporting irregularities in her workplace. Ms. Horton was initially seen in my office on February 7, 2007 for major depression with symptoms including:

- feelings of depression
- anxiety and panic attacks
- fatigue
- decrease in energy
- loss of interest in pleasureable activities
- difficulty concentrating
- Increased tearfulness
- sulcidal thoughts and actions
- appetite change
- difficulty sleeping

Ms. Horton described increasing stress and depressive symptoms after she reported irregularities in medicaid billing. She stated that she believes she lost her job at Hyundai due to these stressors which resulted in tremendous financial stess. This financial stress created marital problems and contributed to divorce. She also was subsequently unable to pay college tultion and her child had to withdraw from college. This created a very difficult emotional environment for Ms. Horton. When Ms. Horton was initially seen, she was unable to function on a daily basis and had been hospitalized for depression and a suicidal act. Frecommend that she continue counseling on an ongoing basis and cannot predict an end for therapy as it appears that this has impacted her negatively.

Sincerely,

Cheryl L. Bowle LCSW; LMFT

Hisabeth Hor m DOB 6/18/63

Presents with complaints of depression. She had been attending Springwood Betaviral Hospital for assistance in depression & stress management. She reports medical perflems of high blood pressure & aremia for which she is being treated.

Elizabeth is an attraction Flack woman, well growned and articulate. She has 3 children ages 20, 22 + 27. The states she has good rules with he children. She wapter an abusin marriage for which she sought marriage counseling. She states childhood was good with strong ties to valations. He stated stressors include sengle parenthood, financial problems, ligal issues that created difficulty @ work with resultant financial problems to she was a whistle-blower. She states that she had difficulty managing stressors I that she was 'pushed over the Jap". He supports include:

aspilite Change
revousnes
fatigue
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curjumy pour. She reports esperiency flasback velader to the whistle-Howing excident. disussion Job stress agitation & writability menony proon & House concentrating afficilly trusting social withdrawal of isolation Goals un Therapy to include lesser signitoms of depression, unprine stress management techniques & Vuleau & lessen impach of whistle - blowing She scheduled next opposition for 2/15/07. The diagnosis us major depressin - severe LAF source 65. CBOWO LCSW: IMFT

History Elizabeth Horton

Chief arrives Pake. She states she has had difficulty sheeping & continues to have difficulty with motivation & interest in activities. We assure how this rulakes to discussion. He a spice are poor. Ale does shown & dress daily. She is upsel at situation @ work. She asks to continue to come 21's weekly. He grass are to improve Abl's - in sheep scheduly healthy eating attempt to lyercise She derive current suicided literature. Bown Isw. Inter

2/23/polizai ih Horton -DN KA

31/07 Elizabuth Horton—

Al discribes continued difficulty of sleeping. She

so continued to express upset of situation a

with the discussed conflict of supervisor who
she believes was unfair to her Me strategy;
how to respond a work the states ADCS

are improving, but she states do so not a

same livel of asherement as she son her

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plans.

Chown USWIMIT

3/9/87 DN+A

3/21/07 Patient wir was love. The tills in acting regarding incident that occurred & work, I've discuss importance of having activities that are restrative. By states the hemembers doing these activities in the Respectal of their they were helpful. The states the is in limited budget the denies suicidal throat. Ofour USWILMTO

4/6/07 Elizab 4 Horton

HECE Patient has a Feet down turn of emotion. The describes feeling writable of more depused, She is unable to educatify lause. The deries suicidal thrughts. The dols report financial struggle: She has been up able to qued enjoyable activities. Palient states that if she does you suicidal she will go to Springwood Bows (CSW; Ymoto)

= 14/07 Patiel late Carub appointment.
CRown LRSW; Invo

6/4/07 Elizaheth Horton

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6/19/07 Polent states she Jul states she is lating healthy. The reports she is experiencing some difficulty is peur relationships but she states the is able to handle. She states she is have to handle she states she is he entiruing to have difficulty looking forward to thing. In denies similarlift. Pt is admiss to discuss medication assummability. Pt is admiss to discuss medication assummability. Pt is admiss to discuss medication assums the Dr crown that